

3. Did the NLRB err by departing from its own established standards in reversing the Administrative Law Judge's decision to defer to the prior arbitration

award under *Speilberg Mfg. Co.*, 112 NLRB 1080 (1955) and *Olin Corp.*, 268 NLRB 573 (1984)?

4. Did the NLRB err by finding that the prior arbitration award is not susceptible of an interpretation that is consistent with the NLRA, concluding that the arbitration decision is clearly repugnant to the Act, and therefore holding deferral to the arbitration award was not appropriate?

5. Did the NLRB err in ordering Verizon to post the notice attached to the NLRB's decision at 362 NLRB No. 24 at "Appendix"?

Respectfully Submitted,

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By its Attorneys,

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Dated: April 23, 2015

**CERTIFICATE OF SERVICE**

I, Arthur G. Telegen, Esq., hereby certify that on April 23, 2015, copies of the foregoing **PETITIONER'S STATEMENT OF ISSUES TO BE RAISED** was served upon the following via pre-paid first class U.S. Mail:

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